

December 6, 2002

RE: Perdue Farms, Inc
TO: Interested Parties / Applicant

027-16270-00026

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision - Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.state.in.us/idem

December 6, 2002

Mr. Scott Nally
Perdue Farms, Inc.
P.O. Box 539
Washington, Indiana 47501

Dear Mr. Nally:

Re: Exempt Construction Status,
027-16270-00026

The application from Perdue Farms, Inc., received on October 28, 2002, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following two (2) natural gas direct fire hot water heaters, to be located at 315 Clark Road, Washington, Indiana, are classified as exempt from air pollution permit requirements:

- (a) Two (2) natural gas, direct fired hot water heaters (identified as 007 and 008), each with a maximum capacity of 10.2 MMBtu/hr and exhausting to stacks 007 and 008, respectively.

The following conditions shall be applicable:

- (a) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following:
 - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.
- (b) This existing source submitted their MSOP application (027-16821-00026) on October 28, 2002. The hot water heaters will be incorporated into the MSOP prior to issuance.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.



Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Sanober Durrani, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7810 to speak directly to Ms. Durrani. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

ERG/SD

cc: File - Daviess County
Daviess County Health Department
Air Compliance - Jim Thorpe
Permit Tracking - Sara Cloe
Technical Support and Modeling - Michele Boner
Compliance Branch - Karen Nowak

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Exemption

Source Background and Description

Source Name: Perdue Farms, Inc.
Source Location: 315 Clark Road, Washington, Indiana 47501
County: Daviess
SIC Code: 2015
Operation Permit No.: E027-16270-00026
Permit Reviewer: ERG/SD

The Office of Air Quality (OAQ) has reviewed an application from Perdue Farms, Inc. relating to the construction of two (2) natural gas, direct fired, hot water heaters.

New Emission Units and Pollution Control Equipment Receiving Prior Approval

- (a) Two (2) hot water heaters burning natural gas, each rated at 10.2 MMBtu/hr, and exhausting to stacks 007 and 008, respectively.

Existing Approvals

The source has constructed or has been operating under the following previous approvals:

- (a) CP-027-2863-00026, issued on August 13, 1993.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
007	Hot Water Heater	22	2	4,131	67
008	Hot Water Heater	22	2	4,131	67

Recommendation

The staff recommends to the Commissioner that the exemption be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on November 4, 2002.

Emission Calculations

See Appendix A (pages 1 and 2) of this document for detailed emissions calculations.

Potential To Emit of New Emission Units Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	0.68
PM-10	0.68
SO ₂	0.05
VOC	0.49
CO	7.51
NO _x	8.94

HAP's	Potential To Emit (tons/year)
TOTAL	Negligible

The potential to emit (as defined in 326 IAC 2-7-1(29)) of pollutants is less than the levels listed in 326 IAC 2-1.1-3(d)(1), therefore, the water heaters are subject to the provisions of 326 IAC 2-1.1-3.

County Attainment Status

The source is located in Daviess County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Daviess County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Daviess County has been classified as attainment or unclassifiable for PM, PM₁₀, SO₂, NO₂, O₃, CO, Pb. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-

2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this Exemption, is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This status is based on calculations of PTE prepared for this source's Minor Source Operating Permit No.: 039-16821-00470 which is currently being prepared by IDEM, OAQ. This status has been verified by the OAQ inspector assigned to the source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of two (2) natural gas direct fire hot water heaters will emit greater than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 will apply.

326 IAC 8-1-6 (New Facilities - General Reduction Requirement)

This source does not have potential VOC emissions equal to or greater than twenty five (25) tons per year, therefore this source is not subject to the provisions of 326 IAC 8-1-6.

Conclusion

The construction of the two hot water heaters shall be subject to the conditions of the attached proposed Exemption 027-16270-00026.